

EXHIBIT 4



BegControl : PUBLIX-MDLT8-001472
70

EndControl : PUBLIX-MDLT8-001472
83

FamilyID :

Internal Reference Number :

Custodian : Hewell, Chris

Custodian - All :

DocDate : 10/4/2022 12:00 AM

Document Date :

Date Last Modified : 10/4/2022

Date Created : 10/4/2022

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Substance Monitoring
Program.pdf

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Relativity Image Count : 14

McKESSON

Empowering Healthcare

May 1st

April 16, 2008

Fred Ottolino
Publix Super Markets
PO Box 407
Lakeland, FL 33802-0407

Dear Fred:

The abuse of prescription drugs, particularly controlled substances, has become a serious problem among millions of Americans. In recent years, the federal government has committed to combating this abuse by implementing monitoring programs and taking enforcement action to keep controlled substances out of the hands of those who intend to misuse them.

The DEA is requiring that McKesson and all wholesale distributors play an expanded role in monitoring the order and distribution of controlled substances. McKesson has responded by implementing a new Controlled Substances Monitoring Program (CSMP) which will be rolled out in the next 90 days. In the enclosed packet, you will find a comprehensive overview of the CSMP, as well as answers to what we anticipate may be frequently asked questions.

We appreciate your understanding and cooperation as we do our part to assist the government and other participants in the healthcare industry address this serious problem.

Sam Thompson will be following up with you to provide more details about this new program and to answer any questions you might have.

Sincerely,



John Figueroa
President
U.S. Pharmaceutical Distribution
McKesson Pharmaceutical



Jack W. Fracie
EVP, Retail National Accounts
U.S. Pharmaceutical Distribution
McKesson Pharmaceutical

CC: Sam Thompson
Chris Hines
Paul Hines
Chris Hewell

• file buy - communicate ahead of time
• quarterly/monthly adjustments
• new stores? John & Karen -

warning - 80% of max?
Exceeded warning?
New store checklist

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

PUBLIX-MDLT8-00147270

P-01389_2

McKESSON

Empowering Healthcare

April 16, 2008

Fred Ottolino
Publix Super Markets
PO Box 407
Lakeland, FL 33802-0407

Dear Fred:

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Jack W. Fragie
EVP, Retail National Accounts
U.S. Pharmaceutical Distribution
McKesson Pharmaceutical

CC: Sam Thompson
Chris Hines
Paul Hines
Chris Hewell

P-PUB-0436

Invoice Messaging

MCKESSON

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MCKESSON**Invoice**

*** Repeat printout ***

MCKESSON DRUG DC#8104
3000 KENSKILL AVE
WASHINGTON COURT HOUSE OH 43100Phone: 800/482-3784
DEA: MC012345ZPI1 Billing Type: ZPF2
Sample Document
RD1 670
Printed: 02/15/2008 08:37:26
/ / 030Billing No.: 7245689926
Billing Date: 02/14/2008
PO#: 20080214171236BILL TO:
ABC DRUG STORE
2 PUBLIC SQUARE
GALION OH 44833-1972SHIP TO:
ABC DRUG STORE
1234 E Main St
COLUMBUS OH 43205DEA: MC012345
PHCY: 02-0107650

MC012345	CB2	814	1 of 4
Customer	Route	Stop	Page

All product discounts earned or granted under McKesson, Value-Net, and Health Mart programs, including off-invoice allowances, may be subject to certain state and federal laws and regulations regarding reporting and/or disclosure requirements and may be required to be reflected in the gross amount or charges made by your pharmacy under Medicaid, Medicare or any other healthcare reimbursement program or program plan.

DEPT	ITEM#	DEL DOC#	QTY	UM	ITEM DESCRIPTION	AWP OR RETAIL	UNIT PRICE	GP I % D CODE	EXTENDED AMOUNT	H M
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test

No recall messages at this time.

JB	274-4811	67201019 Above Item	CONTAINER 1107473087							
			1	*	EA HYDROC B-AP TB 10 500 WAT 100g	53.27	13.18*	75.3	1KB	13.18
			4		EA Omit - Monthly Regulatory Maximum Purchases Exceeded					
JE	120-6747	67201019	CONTAINER 1107473085							
			10	CT	SUFENTANIL 50MCG ML 1ML BAX 10	112.50	89.57	11.2	1 X	895.00

Warning - Approaching Monthly Regulatory Purchase Limit

4 EA Omit - Monthly Regulatory Maximum Purchases Exceeded

Warning - Approaching Monthly Regulatory Purchase Limit

4/16/2008

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1

PUBLIX-MDLT8-00147274

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

Proclarity

Ad justments

Retail Value

Access* database

Sheree - request Proclarity may need to request drive as well

Proclarity -

cube for browsing

pharmacy DM

- Loss prevention

Call Kent - make a copy of access database - move to
secured folder, immediately.

OMP - add faith to distribution list

L17DOLPP1 }
L17DOLPQ1 }

McKesson Controlled Substances Monitoring Program

Program Guide for Pharmacies

Program overview

McKesson is enhancing our policies and practices for distributing controlled substances to our pharmacy customers. We have designed our Controlled Substances Monitoring Program (CSMP) to improve our ability to monitor orders of controlled substances.

- With this program, we have put in place a sophisticated technology system that will allow for proactive, two-way communications between McKesson and your pharmacy.

Program details

All U.S. drug wholesalers have always been required by the DEA to monitor the ordering of controlled substances. Those regulations have not changed, but the extent to which wholesalers are now required to monitor and enforce the legitimate use of controlled substances has. While we trust and respect our customers' integrity and professionalism, we must cooperate with these mandates from the DEA.

Therefore, beginning this month, McKesson will implement the CSMP. Here's how the program works:

- McKesson will monitor purchases of all controlled substances by all customers.
- A critical component of this program is the establishment of controlled substance thresholds.
- Realizing that each customer's business is unique, McKesson has taken great care to set a threshold level specific to your business needs.
- Thresholds are determined by an analysis of each customer's controlled substances purchase history.
- Thresholds are monitored monthly and adjusted if necessary.
- Customers will be alerted in advance of meeting or exceeding their thresholds.
- Customers can apply for threshold adjustments if their business is changing or they anticipate needing to place a larger order.

Notification system

Your McKesson ordering system conducts real-time monitoring of controlled substance purchases according to DEA base code. McKesson's CSMP works with your regular ordering system processes to deliver communications in plenty of time for your pharmacy to take corrective action, helping head off any potential disruptions in supply.

Advance warning alerts

If your pharmacy approaches a threshold for a given product, you will receive an alert message on your invoice or delivery document, alerting you that you are approaching your regulatory purchase limit, so you can monitor your purchases for the rest of the month.

Threshold exceeded

If for some reason your pharmacy exceeds its threshold for a given product, you will see a "V" code in your ordering system, as well as printed on your invoice. This code signals that the product will be omitted from your order because you exceeded your monthly threshold.

Communicating anticipated order increases

We recognize your business is constantly changing, so your future controlled substance ordering needs may vary from your order history. McKesson has developed a Threshold Change Request process, allowing you to communicate your needs in advance so we can accommodate them in advance of any delays or disruptions in delivery.

McKesson values you and your business and is committed to working closely with you to ensure that your pharmacy continues to be successful. This program addresses the DEA's requirements to ensure controlled substances are used in the way they were intended, but it also ensures that you as a McKesson customer can continue with business as usual.

Your McKesson representative will be contacting you shortly to walk you through the new processes and answer any questions you might have.

McKesson Corporation
4507 Brickyard Bayou Road
Gulf Breeze, FL 32563
850-916-1434



December 4, 2007

Mr. Paul Hines
Director of Pharmacy Administration
Publix Super Markets, Inc.
3300 Publix Corporate Parkway
Lakeland, FL 33811

Subject: McKesson Lifestyle Drug Monitoring Program (LDMP)

Dear Paul,

I want to let you know about a change in McKesson's processes to better monitor and support the DEA's ongoing effort to control illegal internet pharmacies.

In an effort to combat inappropriate drug diversion through illegal internet pharmacies, McKesson has modified our monitoring processes on the distribution of certain controlled substance lifestyle drugs. Pharmaceutical wholesalers, including McKesson, are being held accountable for controlling the quantities of these drugs shipped to customers and will be held responsible for reviewing trends as indicated by customers' order history.

To better control the distribution of these drugs, McKesson has developed the Lifestyle Drug Monitoring Program (LDMP). This program began on May 1, 2007 and focuses on four drugs: Oxycodone, Hydrocodone, Phentermine and Alprazolam. Shipment and monitoring of these drugs will be measured by "dose units" rather than "sell units" with 8,000 dose units as the threshold for excessive quantities. The LDMP will also monitor customers exceeding the threshold, reduce orders if necessary and provide documentation and reporting to the DEA.

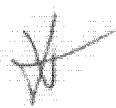
To help us better comply with DEA, please complete the following form and return it to me by January 7, 2008. I've also attached a report on your store level orders that were more than 8,000 dose units for the month of November 2007. In the future, your Account Manager will provide this report to you on a monthly basis. If you have any questions, please don't hesitate to contact me at 850-916-1434.

Thank you,

Sam Thompson
Vice President Strategic Solutions
National Accounts

Attachment

DECLARATION OF CONTROLLED SUBSTANCES PURCHASES

1. Publix Super Markets, Inc. (hereinafter "Company") located at 3300 Publix Corporate Parkway, Lakeland, FL 33811 maintains retail pharmacies nationwide that are registered with the Drug Enforcement Administration to distribute controlled substances ("Pharmacies").
2.  Company declares and attests that its Pharmacies fully comply with all federal and state laws and regulations on the dispensing of controlled substances including but not limited to dispensing to patients only pursuant to a legitimate prescription issued in the course of an established doctor-patient relationship (e.g., pursuant to a physical examination) and only for a legitimate medical purpose.
3. Company will not knowingly dispense controlled substances for prescriptions that have been received by its Pharmacies via the internet, mail-order, or other non-walk-in customer where it has reason to believe that the prescription was issued without a legitimate medical purpose.
4. Company states that the requirements of its Pharmacies for purchases of Lifestyle Drugs (e.g., hydrocodone, phentermine, alprazolam, oxycodone) from McKesson are necessary for the following reasons: *[please describe the reason for purchasing these drugs in the quantities requested including information about the prescriber and the general purposes for which the drugs are being prescribed.]*

5. Company certifies that it has made sufficient inquiry to be able to make this declaration truthfully, accurately and without material omissions. Company affirms by signing this declaration that all of the above information is true and correct to the best of its knowledge and belief.

 Signature

 Printed Name of Signer

 Title

 Date

